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*Counsel for Plaintiff and the Proposed Classes*      *Counsel for Defendant*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JILL LEOVY, individually, and on behalf of  
all others similarly situated,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:23-cv-03440-AMO

**CLASS ACTION**

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO MODIFY THE BRIEFING  
SCHEDULE RE: DEFENDANT'S  
MOTION TO DISMISS PLAINTIFF'S  
SECOND AMENDED COMPLAINT**

*[Proposed Order filed concurrently herewith]*

Complaint Filed: July 11, 2023  
FAC Filed: January 5, 2024  
SAC Filed: June 27, 2024

Through their undersigned counsel, Plaintiff Jill Leovy (“**Plaintiff**”) and Defendant Google LLC (“**Defendant**”) (collectively, “**Parties**”), by and through their respective counsel, jointly request that the Court modify the briefing schedule on Defendant’s Motion to Dismiss (DKT. No. 55). In support of their stipulated request, the counsel for the Parties declare as follows:

1. WHEREAS, On July 29, 2024, Defendant filed its Motion to Dismiss Plaintiff’s Second Amended Complaint (“**Motion**” or “**Motion to Dismiss**”) (DKT No. 55), which is set for hearing on December 19, 2024, before the Honorable Araceli Martínez-Olguín;

2. WHEREAS, pursuant to Local Rule 7-3(a), Plaintiff’s Opposition to Defendant’s Motion is currently due on August 12, 2024;

3. WHEREAS, pursuant to Local Rule 7-3(c), Defendant’s Reply Brief in support of its Motion is currently due on August 19, 2024;

4. WHEREAS, on July 30, 2024, Plaintiff’s counsel conferred with Defense counsel regarding the Parties’ briefing schedule, and current scheduling conflicts. The Parties agreed to a briefing schedule to accommodate one another.

5. The requested extension will not prejudice either party. The hearing on Defendant’s Motion is currently set for December 2024, and the proposed briefing will be submitted months in advance of the anticipated hearing.

**NOW, THEREFORE**, the Parties hereby jointly stipulate that the Court approve the Parties’ proposed briefing schedule associated with Defendant’s Motion, as follows:

- a. Plaintiff’s Opposition to Defendant’s Motion to Dismiss shall be filed on or before August 22, 2024; and
- b. Defendant’s Reply in Support of its Motion to Dismiss shall be filed on or before September 12, 2024.
- c. The hearing on Motion to Dismiss currently set for December 19, 2024, shall remain unchanged.

**IT IS SO STIPULATED.**

1 DATED: July 31, 2024

**CLARKSON LAW FIRM, P.C.**

2 /s/ Yana Hart

3 Yana Hart, Esq.

4 *Attorneys for Plaintiff and the Proposed Classes*

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6 DATED: July 31, 2024

**WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation**

8 /s/ Eric P. Tuttle

9 Eric P. Tuttle, Esq.

10 *Attorneys for Defendant Google LLC*

**ATTESTATION UNDER LOCAL RULE 5-1(i)(3)**

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: July 31, 2024

**CLARKSON LAW FIRM, P.C.**

/s/ Yana Hart

Yana Hart, Esq.

1 **[PROPOSED] ORDER**

2 The Court having reviewed and considered the Parties' Joint Stipulation to Modify Briefing  
3 Schedule on Defendant's Motion to Dismiss Plaintiff's Second Amended Complaint (DKT No. 55),  
4 and good cause appearing, hereby grants the Joint Stipulation as follows:

- 5 a. Plaintiff's Opposition to Defendant's Motion to Dismiss shall be filed on or before  
6 August 22, 2024; and  
7 b. Defendant's Reply in Support of its Motion to Dismiss shall be filed on or before  
8 September 12, 2024.  
9 c. The hearing on Motion to Dismiss currently set for December 19, 2024, shall remain  
10 unchanged.

11 **IT IS SO ORDERED.**

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13 DATED: \_\_\_\_\_, 2024

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14 Hon. Araceli Martínez-Olguín  
15 United States District Court Judge  
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